

To: Hansen, Mark[Hansen.Mark@epa.gov]; Casso, Ruben[Casso.Ruben@epa.gov]
From: Verhalen, Frances
Sent: Tue 12/29/2015 4:52:08 PM
Subject: LDEQ - Chloroprene in La Place

I just spoke with Bob Bailey at LDEQ.

• At this time, LDEQ is planning on collecting some canister samples in early- to mid-January to see if canisters can be used. In their research on chloroprene, LDEQ found that chloroprene has a half-life in ambient air of about 1.6 hours (about 1 hour 40 minutes). At this time, Bob is not confident that results can be seen from the canister samples, as the chloroprene may dissipate before it is analyzed.

• LDEQ has ordered the chloroprene standard for the MAML. It will take about 4 weeks for the company to prepare and an additional two weeks to work out the analytical procedures and check for interferences (and co-elutions). Bob expects to be ready to collect neighborhood samples in mid to late February.

More as I get it.

Frances Verhalen, P.E., Chief

Air Monitoring and Grants Section

US Environmental Protection Agency

1445 Ross Avenue (MC 6MM-AM)

Dallas, TX 75202

214-665-2172

verhalen.frances@epa.gov

To: Brescia, Nicolas[brescia.nicolas@epa.gov]; Petersen, Chris[petersen.chris@epa.gov]; Ruhl, Christopher[Ruhl.Christopher@epa.gov]
From: Crossland, Ronnie
Sent: Wed 12/9/2015 5:00:52 PM
Subject: Fwd: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 8 2015.docx

Sent from my iPhone

Begin forwarded message:

From: "McQuiddy, David" <Mcquiddy.David@epa.gov>
Date: December 9, 2015 at 10:52:42 AM CST
To: "Stenger, Wren" <stenger.wren@epa.gov>
Cc: "McDonald, James" <McDonald.James@epa.gov>, "Hill, Troy" <Hill.Troy@epa.gov>, "Hansen, Mark" <Hansen.Mark@epa.gov>, "Verhalen, Frances" <verhalen.frances@epa.gov>, "Casso, Ruben" <Casso.Ruben@epa.gov>, "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>, "Brescia, Nicolas" <brescia.nicolas@epa.gov>, "Humphrey, Marvelyn" <humphrey.marvelyn@epa.gov>, "Ritter, Melvin" <Ritter.Melvin@epa.gov>, "O'Neill, Francis" <oneill.francis@epa.gov>
Subject: RE: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 8 2015.docx

Wren,

We have reviewed the Houston Laboratory part of the Draft Action Plan (included below for reference) and offer the following comments/clarifications:

- The Houston Laboratory has an inventory of approximately 75 summa canisters, however we only have 15 composite sampler assemblies (with critical orifices that set sampling duration). So, a sampling plan limitation is turnaround (cleaning and calibration) of the sampler assemblies. A possible way to increase the number of weekly samples is to acquire additional composite sampler assemblies (15 composite samplers equipped for 24 hour sampling is approximately \$11,000).
- We estimate a capacity to analyze up to 10 samples per day with a 3-day turnaround time for the analytical report.
- A purchase request for chloroprene standard, \$2,605, was approved on Monday, 12/7.

Ex. 5 - Deliberative

Excerpt from Action Plan:

Ex. 5 - Deliberative

Wes McQuiddy
Chief, Environmental Services Branch

U.S. EPA Region 6 (6MD-H)
10625 Fallstone Road
Houston, Texas 77099

214-665-6722

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From: McDonald, James
Sent: Tuesday, December 08, 2015 11:12 AM
To: McQuiddy, David; Hill, Troy
Subject: FW: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 8 2015.docx

Please provide any comments.

Thanks.

From: Stenger, Wren
Sent: Tuesday, December 08, 2015 11:11 AM
To: Curry, Ron; Coleman, Sam; Gray, David; Ruiz, Thomas; Honker, William; Blevins, John; Edlund, Carl; Blanco, Arturo; McDonald, James; Pettigrew, George; Stenger, Wren
Subject: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 8 2015.docx

Latest draft of Chloroprene action plan. Please review and confirm your information is correctly captured. Share with your staff, as needed. Thanks for all the input.

To: Brescia, Nicolas[brescia.nicolas@epa.gov]; Petersen, Chris[petersen.chris@epa.gov]
From: Crossland, Ronnie
Sent: Mon 12/7/2015 8:35:56 PM
Subject: Fwd: NATA draft Comm Strat
[NATA LaPlace Communication Strategy \(1\).docx](#)
[ATT00001.htm](#)

Sent from my iPhone

Begin forwarded message:

From: "Gray, David" <gray.david@epa.gov>
Date: December 7, 2015 at 2:24:42 PM CST
To: "Stenger, Wren" <stenger.wren@epa.gov>, "Curry, Ron" <Curry.Ron@epa.gov>, "Coleman, Sam" <Coleman.Sam@epa.gov>, "Blanco, Arturo" <Blanco.Arturo@epa.gov>, "Blevins, John" <Blevins.John@epa.gov>, "Seager, Cheryl" <Seager.Cheryl@epa.gov>, "Edlund, Carl" <Edlund.Carl@epa.gov>, "Garcia, David" <Garcia.David@epa.gov>, "Gilrein, Stephen" <gilrein.stephen@epa.gov>, "Harrison, Ben" <Harrison.Ben@epa.gov>, "Honker, William" <honker.william@epa.gov>, "Phillips, Pam" <phillips.pam@epa.gov>, "Smith, Rhonda" <smith.rhonda@epa.gov>, "Taheri, Diane" <Taheri.Diane@epa.gov>, "Pettigrew, George" <pettigrew.george@epa.gov>, "Lyke, Jennifer" <Lyke.Jennifer@epa.gov>
Cc: "Brown, Jamesr" <brown.jamesr@epa.gov>, "Runnels, Charlotte" <Runnels.Charlotte@epa.gov>, "Ruiz, Thomas" <Ruiz.Thomas@epa.gov>, "Anderson, Israel" <Anderson.Israel@epa.gov>, "Hansen, Mark" <Hansen.Mark@epa.gov>, "Verhalen, Frances" <verhalen.frances@epa.gov>, "Casso, Ruben" <Casso.Ruben@epa.gov>, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>, "Ruhl, Christopher" <Ruhl.Christopher@epa.gov>, "Johnson, Lydia" <johnson.lydia@epa.gov>, "Young, Carl" <young.carl@epa.gov>, "McGee, Tomika" <McGee.Tomika@epa.gov>, "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>
Subject: NATA draft Comm Strat

Please use EDIT MODE to capture your comments and changes.

David

To: Compton, Harry[Compton.Harry@epa.gov]; Greenberg, Marc[Greenberg.Marc@epa.gov]
From: Crossland, Ronnie
Sent: Thur 12/3/2015 8:08:21 PM
Subject: TAGA

Harry and Marc

What is the availability of the TAGA and can it detect Chloroprene or 1,3 butadiene? I don't have a site, asking because DRA wants to know.

Thanks,
Ronnie

Sent from my iPhone

To: Air Division Directors and Deputies[Air_Division_Directors_and_Deputies@epa.gov]; PADs and Alternates[PADs_and_Alternates@epa.gov]
Cc: Haman, Patricia[Haman.Patricia@epa.gov]; Harrison, Melissa[Harrison.Melissa@epa.gov]; Jones, Enesta[Jones.Enesta@epa.gov]; Drinkard, Andrea[Drinkard.Andrea@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]
From: Millett, John
Sent: Thur 12/17/2015 7:22:13 PM
Subject: NATA 2011 to be posted at 3PM
[NATA 2011 Fact Sheet - FINAL - clean.docx](#)
[NATA 2011 External FAQ.docx](#)
[2011 NATA KEY MESSAGE SV3.docx](#)

Hi All – NATA will soon be live at: www.epa.gov/national-air-toxics-assessment .

We are not issuing a press announcement for NATA 2011, but in case you receive press inquiries, please refer them to Enesta Jones in the HQ press office (202-564-7873, jones.enesta@epa.gov).

Ex. 5 - Deliberative

Ex. 5 - Deliberative

Please do not forward this e-mail to anyone without an EPA badge. The best source for information to share will be the website: www.epa.gov/national-air-toxics-assessment .

Attached are:

INTERNAL:

Key messages

EXTERNAL:

Public Fact sheet

Public Q/As

Thanks – John

~~~~~

John Millett

Director, OAR Communications

Desk: 202-564-2903

Cell: 202-510-1822

**To:** Gray, David[gray.david@epa.gov]  
**From:** Paige Falgoust  
**Sent:** Wed 12/16/2015 11:01:02 PM  
**Subject:** RE: Checking in

Thanks.

**Paige Falgoust**

Communications Director

St. John the Baptist Parish

1801 West Airline Hwy, LaPlace, LA 70068

w 985.652.9569 | c 985.287.2603 | [p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)

[sjbparish.com](http://sjbparish.com) | [Facebook](#) | [@SJBPgov](#)

Sign up to receive emergency and important messages through the new [mass notification system](#)

**From:** Gray, David [mailto:gray.david@epa.gov]  
**Sent:** Wednesday, December 16, 2015 4:48 PM  
**To:** Paige Falgoust <p.falgoust@sjbparish.com>  
**Subject:** Re: Checking in

Also - I am serious on coming over to talk early next week. It is not a problem.

Sent from my iPhone

On Dec 16, 2015, at 3:46 PM, Paige Falgoust <[p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)> wrote:

Thank you for the information and thank you for scheduling the webinar today.

Should we receive questions, can we direct them to you?

Also, can you send me the link once it is made available?

Thank you. Be safe traveling.

**Paige Falgoust**

Communications Director

St. John the Baptist Parish

1801 West Airline Hwy, LaPlace, LA 70068

w 985.652.9569 | c 985.287.2603 | [p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)

[sjbparish.com](http://sjbparish.com) | [Facebook](#) | [@SJBPgov](#)

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**From:** Gray, David [<mailto:gray.david@epa.gov>]

**Sent:** Wednesday, December 16, 2015 4:32 PM

**To:** Paige Falgoust <[p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)>

**Subject:** Re: Checking in

Paige

Here is a copy of my revised background information for NATA. It is intended for internal use only to respond to questions and guide discussions with external parties. Let me know if you have any comments.

David

## **DRAFT 2011 NATA CHLOROPRENE COMMUNICATION INFORMATION**

December 2015

### **OVERVIEW**

On December 17, EPA announced its 5th national scale assessment. The 2011 National Air Toxics Assessment (NATA), a screening-level assessment, for the United States. NATA is not a definitive predictor of health effects. It tells us to look further.

NATA contains emissions data from 2011 and uses models to make broad estimates of health risks over geographic areas of the country. NATA uses emissions, modeled ambient conditions and estimated inhalation exposures from outdoor sources.

Although NATA does not rank or single out areas of the country as having the highest risks, the results include a census tract level cancer risk information which is available online via EPA's Geoplatform – NATA Web App.

Estimated risk is reported as 'x in a million' potential cases of cancer based on if 1 million people were continuously and equally exposed to a specific chemical for 24 hours per day over 70 years. In general, EPA looks more closely at areas with greater than 100 in a million estimated risk.

NATA is a tool for EPA and States/local/Tribal Agencies to prioritize pollutants, emission sources and locations of interest.

The NATA 2011 found a high estimated cancer risk census track in St. John the Baptist Parish, Louisiana. At this location, estimated risk of 800-in-a-million was indicated by NATA. This elevated risk is driven by chloroprene emissions from the DuPont/DENKA Neoprene Production facility.

Chloroprene is a chemical used in the production of Neoprene. Neoprene has a variety of uses, such as wetsuits, gaskets, hoses and adhesives. Chloroprene was classified as a likely carcinogen by EPA in 2010.

This analysis indicates the need for further follow up. A closer look at the emissions, pollution controls and operations at the facility, along with air monitoring in the surrounding area and nearby communities, is necessary to more confidently assess the risks.

EPA verified the modeled emissions data with DuPont/DENKA. Using its authority under the Clean Air Act, the agency will require the facility to provide data and perform more detailed stack testing for emissions and a review of emission controls at the facility.

EPA will continue to work with the state, local communities and the facility to address emissions in the near term and will initiate a review of the Clean Air Act toxics regulations that are currently in place to determine what new technologies and approaches can further reduce emissions and risks from chemical manufacturers in this sector.

NATA can identify locations for further study, prioritize pollutants and emission sources and inform monitoring programs. NATA doesn't draw conclusions about actual risk, control specific sources or pollutants, sole support for regulations, compare risks among different areas of the country, or compare to previous NATA assessments.

## **TOPLINE MESSAGES**

EPA has the responsibility to inform the states and communities affected by the results of the NATA analysis.

EPA's intent is not to alarm but to inform and to further investigate in order to be more certain of the level of risk that sources pose in St. John the Baptist Parish.

While the analytical methods are sound and based on the most advanced understanding and best data we have, the agency has been forthright in explaining the limitations of this analysis.

The reason for this analysis is precisely for situations like St. John the Baptist Parish - to identify areas with potentially unacceptable high risk and ideally, act on that information in partnership with state and local community and with the cooperation of sources in the area.

## **QUESTIONS/ANSWERS**

Q: What is Chloroprene?

A: Chloroprene is a chemical used in the production of neoprene. Neoprene has a variety

of uses, such as in wetsuits, gaskets, hoses, and adhesives. Chloroprene is classified as an likely carcinogen by several agencies, including EPA.

Q: Why was chloroprene determined to be a carcinogen?

A: In 2010 EPA's Integrated Risk Information System (IRIS) assessment – which identifies and characterizes the health hazards of chemicals found in the environment – identified chloroprene as a likely human carcinogen and provided a unit risk estimate (URE). A URE provides the upper-bound excess lifetime cancer risk estimated to result from continuous exposure to an agent at a concentration of 1 microgram per cubic meter ( $\mu\text{g}/\text{m}^3$ ) in air. The URE for chloroprene was used in the 2011 NATA.

Q: What is the difference between a known, likely and probable carcinogen?

A: There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.

Q: What is the estimated health risk?

A: The concern is potential chronic (long-term/lifetime) cancer risk from chloroprene.

Q: Why wasn't this facility identified in previous NATA assessments?

A: The IRIS assessment for chloroprene was completed in 2010. While the previous NATA was released in early 2011, the analyses were completed in 2010 prior to the availability of the URE for chloroprene. – five years after the 2005 NATA. At the time of the 2005 NATA, chloroprene did have a noncancer reference concentration – a measure of potency for pollutants with effects other than cancer – and that was used in the assessment.

Q: Does EPA have any regulations for chloroprene?

A: Chloroprene is used in the production of Neoprene, which is covered under EPA's Polymers and Resins I source category. This source category went through a risk and technology review (RTR) in 2008. No cancer risks were estimated at that time because chloroprene did not have a URE.

Q: Will EPA do another RTR for the Polymers and Resins source category in light of the URE for chloroprene?

A: Under Section 112 of the Clean Air Act, EPA is required to periodically perform a review of standards and available technologies for categories for which we have set technology-based standards (e.g., a MACT standard). This category is up for review in 2016.

Q: What is EPA doing to address issues the issue of chloroprene in La Place, LA?

A: NATA is a screening tool that tells use where to look as we gather more information. EPA will launch a process to engage the community and local leaders in developing a plan to gather information important to addressing community concerns, and useful to EPA as it evaluates regulatory changes need to protect public health and the environment.

Q: What is NATA?

A: The National Air Toxics Assessment (NATA) is a screening tool that identifies areas for further analysis to protect Americans from potential health risks. NATA does not single out one area of the country as having the highest risks. NATA uses estimates of emissions and computer models to approximate risks; it is not designed to determine actual health risks to individual people. Emissions data underlying the assessment can vary in level of detail from state to state. For example, one state that reports very detailed emissions data could appear to have higher risks than a state that reports a less complete inventory. In this case, a comparison would not be accurate.

Q: What data are available via NATA App?

- Emissions Data
  - o County and facility level
- Modeled Ambient and Exposure Concentration Data
  - o Pollutant (180) and source category (broad) summaries at census tract level

- Cancer and Noncancer Risks

- o About 140 pollutants at census tract level
- o Pollutants and source group (41) summaries
- o Cancer risks expressed as in-1 million
- o Noncancer risks expressed as Hazard Indices

Q: How long has this been going on?

A: The DuPont-La Place facility has been operating for many years. Historical reporting by the facility show chloroprene emission levels for many years.

<~WRD000.jpg>

Not included above, TRI reports 1988, 1989 and 1990 chloroprene emissions from this facility were: 479 tpy, 486 tpy, and 461 tpy, respectively.

Q: What is the facility allowed to emit under its CAA permit?

A: The current allowable emissions from the facility are 200 tpy, with a few emission points at the facility emitting the majority of the chloroprene.

Q: What are the highest NATA cancer risk areas in the USA?

A: The top 6 census tracts with the highest NATA estimated highest cancer risks nationally are in Louisiana due to DuPont chloroprene emissions.

Sent from my iPhone

Sent from my iPhone

On Dec 16, 2015, at 11:17 AM, Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)> wrote:

We will be using the call in number [1-866-299-3188](tel:1-866-299-3188) code [9195415615](https://www.epa.gov/nata). To view the webinar, <http://epawebconferencing.acms.com/natapreview/> Let me know who will be signing on so I can approve them they connect.

Sent from my iPhone

On Dec 16, 2015, at 11:02 AM, Paige Falgoust <[p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)> wrote:

Thank you - we look forward to the webinar.  
Is there a number of login that I should use?

Paige Falgoust  
Communications Director  
St. John the Baptist Parish

1801 West Airline Hwy, LaPlace, LA 70068  
w 985.652.9569 | c 985.287.2603 | [p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)  
[sjbparish.com](http://sjbparish.com) | Facebook | @SJBPgov  
Sign up to receive emergency and important messages through the new mass notification system

-----Original Message-----

From: Gray, David [<mailto:gray.david@epa.gov>]  
Sent: Wednesday, December 16, 2015 11:14 AM  
To: Paige Falgoust <[p.falgoust@sjbparish.com](mailto:p.falgoust@sjbparish.com)>  
Subject: Checking in

Hi Paige,

We are set to show you slides of what NATA online App will look like once it goes live. We can also walk you through the actual system tomorrow if you need us to do so.

David

Sent from my iPhone

**To:** Gray, David[gray.david@epa.gov]; Noonan, Jenny[Noonan.Jenny@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]  
**From:** Rimer, Kelly  
**Sent:** Wed 12/16/2015 7:45:01 PM  
**Subject:** NATA briefing overview 12 16 15 SJB Parish President.pptx  
[NATA briefing overview 12 16 15 SJB Parish President.pptx](#)

Final Slides for today at 3:30

**To:** Gray, David[gray.david@epa.gov]  
**From:** Bremer, Kristen  
**Sent:** Mon 12/7/2015 7:28:42 PM  
**Subject:** FW: NATA Chloroprene comm plan  
Chloroprene Comm Plan 12\_3\_15.docx

Here's what was sent to Janet. Again, still draft, but feel free to work from this.

Call if you have any questions!

---

Kristen Bremer

Policy Analysis & Communications

U.S. EPA, Office of Air Quality Planning & Standards

Email: [bremer.kristen@epa.gov](mailto:bremer.kristen@epa.gov)

Phone: 919.541.9424

Cell: 919.321.7652

**To:** Gray, David[gray.david@epa.gov]  
**Cc:** Blevins, John[Blevins.John@epa.gov]  
**From:** Gilrein, Stephen  
**Sent:** Mon 12/7/2015 7:28:37 PM  
**Subject:** FW: CDC -NIOSH document I told you about

## Ex. 5 - Deliberative

**From:** Yurk, Jeffrey  
**Sent:** Monday, December 07, 2015 1:03 PM  
**To:** Gilrein, Stephen  
**Subject:** CDC -NIOSH document I told you about

Steve: Based on the article from the link below, it appears DuPont was aware of the possible carcinogenic effects of chloroprene in the 1970's. The article include review of two Russian studies and a claim that DuPont was looking into conducting their own epidemiological studies.

Jeff

[http://www.cdc.gov/niosh/docs/1970/78127\\_1.html](http://www.cdc.gov/niosh/docs/1970/78127_1.html)

**To:** Blevins, John[Blevins.John@epa.gov]; Stenger, Wren[stenger.wren@epa.gov]; Honker, William[honker.william@epa.gov]; Gray, David[gray.david@epa.gov]  
**From:** Coleman, Sam  
**Sent:** Wed 12/2/2015 8:59:34 PM  
**Subject:** FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA  
[Dupont Pontchartrain Works ejscreen .5 mile Radius.pdf](#)  
[Dupont Pontchartrain Works ejscreen - 1 mile Radius.pdf](#)  
[Dupont Pontchartrain Works ejscreen - 3 mile Radius.pdf](#)

FYSA

**Ex. 5 - Deliberative**

**Samuel Coleman, P.E.,**

**Deputy Regional Administrator**

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



**From:** Anderson, Israel  
**Sent:** Tuesday, December 01, 2015 3:35 PM  
**To:** Coleman, Sam  
**Subject:** FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

EJSCREEN data for Dupont Pontchartrain Works, LaPlace, LA at half mile, 1 mile and 3 mile radius [points from the facility.

**From:** Runnels, Charlotte  
**Sent:** Tuesday, December 01, 2015 1:14 PM  
**To:** Anderson, Israel  
**Subject:** EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

Israel,

Attached are EJSCREEN Reports for Dupont Pontchartrain Works within a 5 mile, 1 mile and 3 mile radius of the facility.

To locate the address of the facility, I used the longitude and latitude from the ECHO database. See link below. <http://echo.epa.gov/detailed-facility-report?fid=110000597131>

**To:** Gray, David[gray.david@epa.gov]  
**From:** Stenger, Wren  
**Sent:** Mon 11/30/2015 4:26:02 PM  
**Subject:** 11:30 call this morning FW: Chloroprene and DuPont, LA facility

David, can you join me at 11:30 for a call with Mike Koerber and Erika Sasser on Chloroprene

Ex. 5 - Deliberative

Ex. 5 - Deliberative

**Wren Stenger**

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

**From:** Koerber, Mike  
**Sent:** Monday, November 30, 2015 9:38 AM  
**To:** Stenger, Wren  
**Cc:** Sasser, Erika  
**Subject:** FW: Chloroprene and DuPont, LA facility

Wren – As a followup to my voicemail to you this morning, I am sending you this note in hopes that we can talk today at your convenience. Let me know if you have time. Steve talked with Janet earlier today and I wanted to share her thoughts with you. Thank you.

Mike

Begin forwarded message:

**From:** "Stenger, Wren" <stenger.wren@epa.gov>  
**Date:** November 25, 2015 at 2:16:12 PM EST

**To:** "Page, Steve" <Page.Steve@epa.gov>, "Wayland, Richard" <Wayland.Richard@epa.gov>, "Jordan, Deborah" <Jordan.Deborah@epa.gov>  
**Cc:** "Sasser, Erika" <Sasser.Erika@epa.gov>  
**Subject:** Chloroprene and DuPont, LA facility

Debbie, all,

## Ex. 5 - Deliberative

Ex. 5 - Deliberative

What would be the best way to convene a quick call early next week? Debbie, Sam Coleman may also reach out to you on this.

Wren Stenger

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

**From:** Page, Steve  
**Sent:** Wednesday, November 18, 2015 9:55 AM  
**To:** Stenger, Wren  
**Cc:** Sasser, Erika  
**Subject:** left you a voice mail

Hi Wren,

Please call Erika Sasser regarding the LA Chloroprene issue.

**Ex. 5 - Deliberative**

# **Ex. 5 - Deliberative**

**To:** Potts, Mark[Potts.Mark@epa.gov]  
**From:** Gilrein, Stephen  
**Sent:** Wed 12/9/2015 6:52:33 PM  
**Subject:** FW: DuPont Laplace 2014 Emissions Inventory  
[DuPont LaPlace chloroprene major sources.xlsx](#)

**From:** Yurk, Jeffrey  
**Sent:** Friday, December 04, 2015 7:24 AM  
**To:** Gilrein, Stephen  
**Subject:** DuPont Laplace 2014 Emissions Inventory

Steve: Attached is the 2014 LDEQ emissions inventory for chloroprene sources at the Dupont facility in LaPlace, LA. In summary about 24 tons are being emitted from area/fugitive sources such as building exhaust fans, 21 tons are being released from vents, and 84 tons are coming from stacks. Approximately half the emissions are coming from the top 4 to 5 sources, however in order to bring risk levels down to our typically evaluated regulatory levels of concern (1 to 100 in a million), the top 40 sources need to be evaluated.

Jeff

**To:** Stenger, Wren[stenger.wren@epa.gov]; Honker, William[honker.william@epa.gov]  
**Cc:** Dwyer, Stacey[Dwyer.Stacey@epa.gov]; Kaspar, Paul[kaspar.paul@epa.gov]  
**From:** Schwab, Kay  
**Sent:** Wed 12/9/2015 3:10:29 PM  
**Subject:** FW: Additional Info\_RE: Dupont, La Place and chloroprene--- Need information by COB today (send to Dwyer)

Wren & Bill,

Per your request in the elevator this morning.....

Let me know if you need any further information.

K

Kay Schwab (6WQ-PO)

Environmental Engineer

US EPA Region 6

1445 Ross Ave., Ste. 1200

Dallas, TX 75202-2733

schwab.kay@epa.gov

(214) 665-6635

**From:** Schwab, Kay  
**Sent:** Tuesday, December 08, 2015 4:05 PM  
**To:** Kaspar, Paul  
**Subject:** FW: Additional Info\_RE: Dupont, La Place and chloroprene--- Need information by COB today (send to Dwyer)

Paul,

As we discussed, here is another interesting description from the Fact Sheet.

“Under normal conditions, process wastewater and process area stormwater from the Chloroprene Unit, which includes the crude ACR manufacturing unit, the Hydrochloric Acid Recovery Unit, and the Organic Diamines/Specialty Chemicals Unit are routed to the RCRA waste treatment facilities for underground injection via permitted disposal well and are not discharged to surface waters.

The Process wastewater and process area stormwater from the Neoprene unit are collected and routed to the wastewater treatment plant.”

**From:** Schwab, Kay

**Sent:** Tuesday, December 08, 2015 3:49 PM

**To:** Dwyer, Stacey; Kaspar, Paul

**Cc:** Larsen, Brent; Hamilton, Denise; Burrell, Monica

**Subject:** Additional Info\_RE: Dupont, La Place and chloroprene--- Need information by COB today (send to Dwyer)

1) **Expiration date of permit** LA0005924 (AI No. 38806) was issued Jan 31, 2013, effective date March 1, 2013, expires 5 years after effective date (i.e., Feb 28 2018

The Permittee is E.I. DuPont de Nemours & Co., “Pontchartrain Site,” 586 Hwy 44, LaPlace , LA 70068. (a synthetic rubber & industrial organic chemical manuf. facility)

Outfall 001 (process wastewater) discharges to the Mississippi River (070301) and Outfalls 002-007 discharge to Lake Maurepas (040602) which is in the Lake Pontchartrain Basin.

2) **Is chloroprene a regulated pollutant in the permit?** Per literature, “chloroprene is a synthetic rubber that is more widely known by the name Neoprene, the trademark given to it by DuPont.” Chloroprene is not a regulated pollutant in the permit; however, the permit does contain monthly average (1.09 lbs/day) and daily maximum (4.36 lbs/day) mass limitations for chlorobutadiene at Internal Outfall 101 which discharges via Outfall 001 to the Mississippi River. Outfall 001 also has permit requirements for biomonitoring. In Feb 2014, LDEQ approved the permittee’s request for a biomonitoring frequency reduction since there had been no reported toxicity failures.

The Fact Sheet states that the chlorobutadiene limitations “were established based on BPJ using the concentration guideline limits for dichloropropylene and 1,2-dichloropropane based on 40 CFR 414, Subpart J and a process flow of 0.65376 MGD. These limits were established since chlorobutadiene is known to have a similar response to physical and biological treatment as the above guideline pollutants.”

3) **Were there any previous interim objections on LA proposed permit?** “No Objection” letters were issued by EPA on October 31, 2012 and previously on July 20, 2007.

4) **Any other noteworthy items?** Per literature, DuPont Neoprene was sold to Denka Performance Elastomers LLC (joint venture with Mitsui) in 2015. Information in LDEQ’s EDMS references October 1, 2015 as the effective date for the transfer.

(Denise, per our earlier discussion, please add any relevant ICIS information that you may have.

i.e., Are they in compliance with their mass limitations for chlorobutadiene?)

Please let me know if additional information is needed.

Thanks

K

Kay Schwab (6WQ-PO)

Environmental Engineer

US EPA Region 6

1445 Ross Ave., Ste. 1200

Dallas, TX 75202-2733

[schwab.kay@epa.gov](mailto:schwab.kay@epa.gov)

(214) 665-6635

**From:** Schwab, Kay  
**Sent:** Tuesday, December 08, 2015 11:44 AM  
**To:** Dwyer, Stacey; Kaspar, Paul  
**Cc:** Larsen, Brent; Hamilton, Denise; Burrell, Monica  
**Subject:** RE: Dupont, La Place and chloroprene--- Need information by COB today (send to Dwyer)

Here's some preliminary info....I will look further after lunch.

- 1) LA0005924 (AI No. 38806) was issued Jan 31, 2013, effective date March 1, 2013, expires 5 yrs after effective date. (The Permittee is E.I. DuPont de Nemours & Co., "Pontchartrain Site," 586 Hwy 44, LaPlace, LA 70068. A synthetic rubber & industrial organic chemical manuf facility. 001 to Miss R (070301), 002-007 to Lake Maurepas (040602).
- 2) Chloroprene in permit ?? (...still reviewing permit)
- 3) A "No Objection" letter was issued by Kilty, Oct 31, 2012 (I was out after my father died.)
- 4) Other ?? (...still reviewing permit)

**From:** Dwyer, Stacey  
**Sent:** Tuesday, December 08, 2015 7:23 AM  
**To:** Kaspar, Paul  
**Cc:** Schwab, Kay; Larsen, Brent; Hamilton, Denise; Burrell, Monica  
**Subject:** FW: Dupont, La Place and chloroprene--- Need information by COB today (send to Dwyer)  
**Importance:** High

We will need some information on the Dupont Laplace permit. We don't need a full fact sheet as Wren Stenger is putting together an action plan, but we will need information such as: 1) expiration date of permit, 2) is chloroprene a regulated pollutant in the permit, 3) if there were any interim objections that we previously had on LA proposed permit, 4) any other note worthy

items.

This pertains to a petition that EPA denied in 2003 and 2008. I think the petition was regarding the Air program.

Stacey

**From:** Dwyer, Stacey  
**Sent:** Tuesday, December 08, 2015 7:19 AM  
**To:** Honker, William  
**Cc:** Garcia, David  
**Subject:** RE: Dupont, La Place and chloroprene

OK. I will have Paul Kaspar's group look into the Dupont permit and submit something today.

Stacey

**From:** Honker, William  
**Sent:** Tuesday, December 08, 2015 6:27 AM  
**To:** Dwyer, Stacey  
**Cc:** Garcia, David  
**Subject:** Fwd: Dupont, La Place and chloroprene

Bill Honker

Director, Water Division, EPA Region 6

Begin forwarded message:

**From:** "Stenger, Wren" <[stenger.wren@epa.gov](mailto:stenger.wren@epa.gov)>  
**Date:** December 7, 2015 at 6:03:38 PM CST

**To:** "Blevins, John" <[Blevins.John@epa.gov](mailto:Blevins.John@epa.gov)>, "Honker, William" <[honker.william@epa.gov](mailto:honker.william@epa.gov)>, "Pettigrew, George" <[pettigrew.george@epa.gov](mailto:pettigrew.george@epa.gov)>  
**Subject:** Dupont, La Place and chloroprene

Please advise if you plan to send information for

Emission Inventory (John)

Air Dispersion Modeling (John)

Louisiana Wastewater Discharge Permit (Bill)

OSHA and NIOSH (John)

ATSDR (George)

LA dept of HH/Tumor Registry (George)

Parish Health District (George)

If not, just let me know and I will delete the headers from the Action Plan. Thanks

**Wren Stenger**

**Director**

**Multimedia Planning and Permitting Division**

**EPA Region 6 Dallas, Texas**

**214.665.6583**

**To:** Curry, Ron[Curry.Ron@epa.gov]; Coleman, Sam[Coleman.Sam@epa.gov]; Blanco, Arturo[Blanco.Arturo@epa.gov]; Blevins, John[Blevins.John@epa.gov]; Seager, Cheryl[Seager.Cheryl@epa.gov]; Edlund, Carl[Edlund.Carl@epa.gov]; Garcia, David[Garcia.David@epa.gov]; Gilrein, Stephen[gilrein.stephen@epa.gov]; Gray, David[gray.david@epa.gov]; Harrison, Ben[Harrison.Ben@epa.gov]; Honker, William[honker.william@epa.gov]; Phillips, Pam[phillips.pam@epa.gov]; Smith, Rhonda[smith.rhonda@epa.gov]; Taheri, Diane[Taheri.Diane@epa.gov]; Pettigrew, George[pettigrew.george@epa.gov]; Lyke, Jennifer[Lyke.Jennifer@epa.gov]  
**Cc:** Brown, Jamesr[brown.jamesr@epa.gov]; Runnels, Charlotte[Runnels.Charlotte@epa.gov]; Ruiz, Thomas[Ruiz.Thomas@epa.gov]; Anderson, Israel[Anderson.Israel@epa.gov]; Hansen, Mark[Hansen.Mark@epa.gov]; Verhalen, Frances[verhalen.frances@epa.gov]; Casso, Ruben[Casso.Ruben@epa.gov]; Yurk, Jeffrey[yurk.jeffrey@epa.gov]; Ruhl, Christopher[Ruhl.Christopher@epa.gov]; Johnson, Lydia[johnson.lydia@epa.gov]; Young, Carl[young.carl@epa.gov]; McGee, Tomika[McGee.Tomika@epa.gov]; Crossland, Ronnie[Crossland.Ronnie@epa.gov]  
**From:** Stenger, Wren  
**Sent:** Thur 12/3/2015 11:29:28 PM  
**Subject:** DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx  
[DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx](#)

I already have some input so am resending the draft action plan.  
You can begin to see what this will ultimately look like. Thanks for  
the quick input so far. Still DRAFT

**To:** Gregory Langley[Gregory.Langley@LA.GOV]  
**From:** Gray, David  
**Sent:** Wed 12/16/2015 7:24:52 PM  
**Subject:** NATA draft comm information

Greg,

Here is a copy of my revised background information for NATA. It is intended for internal use only to respond to questions and guide discussions with external parties. Let me know if you have any comments.

David

## **DRAFT 2011 NATA CHLOROPRENE COMMUNICATION INFORMATION**

December 2015

### **OVERVIEW**

On December 17, EPA announced its 5th national scale assessment. The 2011 National Air Toxics Assessment (NATA), a screening-level assessment, for the United States. NATA is not a definitive predictor of health effects. It tells us to look further.

NATA contains emissions data from 2011 and uses models to make broad estimates of health risks over geographic areas of the country. NATA uses emissions, modeled ambient conditions and estimated inhalation exposures from outdoor sources.

Although NATA does not rank or single out areas of the country as having the highest risks, the results include a census tract level cancer risk information which is available online via EPA's Geoplatform – NATA Web App.

Estimated risk is reported as 'x in a million' potential cases of cancer based on if 1 million people were continuously and equally exposed to a specific chemical for 24 hours per day over 70 years. In general, EPA looks more closely at areas with greater than 100 in a million estimated risk.

NATA is a tool for EPA and States/local/Tribal Agencies to prioritize pollutants, emission sources and locations of interest.

The NATA 2011 found a high estimated cancer risk census tract in St. John the Baptist Parish, Louisiana. At this location, estimated risk of 800-in-a-million was indicated by NATA. This elevated risk is driven by chloroprene emissions from the DuPont/DENKA Neoprene Production facility.

Chloroprene is a chemical used in the production of Neoprene. Neoprene has a variety of uses, such as wetsuits, gaskets, hoses and adhesives. Chloroprene was classified as a likely carcinogen by EPA in 2010.

This analysis indicates the need for further follow up. A closer look at the emissions, pollution controls and operations at the facility, along with air monitoring in the surrounding area and nearby communities, is necessary to more confidently assess the risks.

EPA verified the modeled emissions data with DuPont/DENKA. Using its authority under the Clean Air Act, the agency will require the facility to provide data and perform more detailed stack testing for emissions and a review of emission controls at the facility.

EPA will continue to work with the state, local communities and the facility to address emissions in the near term and will initiate a review of the Clean Air Act toxics regulations that are currently in place to determine what new technologies and approaches can further reduce emissions and risks from chemical manufacturers in this sector.

NATA can identify locations for further study, prioritize pollutants and emission sources and inform monitoring programs. NATA doesn't draw conclusions about actual risk, control specific sources or pollutants, sole support for regulations, compare risks among different areas of the country, or compare to previous NATA assessments.

## **TOPLINE MESSAGES**

EPA has the responsibility to inform the states and communities affected by the results of the NATA analysis.

EPA's intent is not to alarm but to inform and to further investigate in order to be more certain of the level of risk that sources pose in St. John the Baptist Parish.

While the analytical methods are sound and based on the most advanced understanding and best data we have, the agency has been forthright in explaining the limitations of this analysis.

The reason for this analysis is precisely for situations like St. John the Baptist Parish - to identify areas with potentially unacceptable high risk and ideally, act on that information in partnership with state and local community and with the cooperation of sources in the area.

## QUESTIONS/ANSWERS

Q: What is Chloroprene?

A: Chloroprene is a chemical used in the production of neoprene. Neoprene has a variety of uses, such as in wetsuits, gaskets, hoses, and adhesives. Chloroprene is classified as a likely carcinogen by several agencies, including EPA.

Q: Why was chloroprene determined to be a carcinogen?

A: In 2010 EPA's Integrated Risk Information System (IRIS) assessment – which identifies and characterizes the health hazards of chemicals found in the environment – identified chloroprene as a likely human carcinogen and provided a unit risk estimate (URE). A URE provides the upper-bound excess lifetime cancer risk estimated to result from continuous exposure to an agent at a concentration of 1 microgram per cubic meter ( $\mu\text{g}/\text{m}^3$ ) in air. The URE for chloroprene was used in the 2011 NATA.

Q: What is the difference between a known, likely and probable carcinogen?

A: There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.

Q: What is the estimated health risk?

A: The concern is potential chronic (long-term/lifetime) cancer risk from chloroprene.

Q: Why wasn't this facility identified in previous NATA assessments?

A: The IRIS assessment for chloroprene was completed in 2010. While the previous NATA was released in early 2011, the analyses were completed in 2010 prior to the availability of the URE for chloroprene. – five years after the 2005 NATA. At the time of the 2005 NATA, chloroprene did have a noncancer reference concentration – a measure of potency for pollutants with effects other than cancer – and that was used in the assessment.

Q: Does EPA have any regulations for chloroprene?

A: Chloroprene is used in the production of Neoprene, which is covered under EPA's Polymers and Resins I source category. This source category went through a risk and technology review (RTR) in 2008. No cancer risks were estimated at that time because chloroprene did not have a URE.

Q: Will EPA do another RTR for the Polymers and Resins source category in light of the URE for chloroprene?

A: Under Section 112 of the Clean Air Act, EPA is required to periodically perform a review of standards and available technologies for categories for which we have set technology-based standards (e.g., a MACT standard). This category is up for review in 2016.

Q: What is EPA doing to address issues the issue of chloroprene in La Place, LA?

A: NATA is a screening tool that tells use where to look as we gather more information. EPA will launch a process to engage the community and local leaders in developing a plan to gather information important to addressing community concerns, and useful to EPA as it evaluates regulatory changes need to protect public health and the environment.

Q: What is NATA?

A: The National Air Toxics Assessment (NATA) is a screening tool that identifies areas for further analysis to protect Americans from potential health risks. NATA does not single out one area of the country as having the highest risks. NATA uses estimates of emissions and computer models to approximate risks; it is not designed to determine actual health risks to individual people. Emissions data underlying the assessment can vary in level of detail from state to state. For example, one state that reports very detailed emissions data could appear to have higher risks than a state that reports a less complete inventory. In this case, a comparison would not be accurate.

Q: What data are available via NATA App?

- Emissions Data
  - o County and facility level
- Modeled Ambient and Exposure Concentration Data

- o Pollutant (180) and source category (broad) summaries at census tract level
- Cancer and Noncancer Risks
- o About 140 pollutants at census tract level
- o Pollutants and source group (41) summaries
- o Cancer risks expressed as in-1 million
- o Noncancer risks expressed as Hazard Indices

Q: How long has this been going on?

A: The DuPont-La Place facility has been operating for many years. Historical reporting by the facility show chloroprene emission levels for many years.

Not included above, TRI reports 1988, 1989 and 1990 chloroprene emissions from this facility were: 479 tpy, 486 tpy, and 461 tpy, respectively.

Q: What is the facility allowed to emit under its CAA permit?

A: The current allowable emissions from the facility are 200 tpy, with a few emission points at the facility emitting the majority of the chloroprene.

Q: What are the highest NATA cancer risk areas in the USA?

A: The top 6 census tracts with the highest NATA estimated highest cancer risks nationally are in Louisiana due to DuPont chloroprene emissions.

Sent from my iPhone

**To:** dwgwork@me.com[dwgwork@me.com]  
**From:** Gray, David  
**Sent:** Wed 12/16/2015 1:54:38 PM  
**Subject:** Draft

Draft, Deliberative  
12/15/2015 8:41 AM

## **DRAFT 2011 NATA CHLOROPRENE COMMUNICATIONS PLAN**

December 2015

### **OVERVIEW**

On December 15, EPA announced its 2011 National Air Toxics Assessment (NATA), a screening-level assessment, for the United States. NATA contains emissions data from 2011 and uses models to make broad estimates of health risks over geographic areas of the country. Although NATA does not rank or single out areas of the country as having the highest risks, the results include a census tract level cancer risk information which is available online via EPA's Geoplatform – NATA Web App. In general, NATA found Reduction in Elevated Risks:

- Fewer tracts with risks greater than 100-in-1 million in 2011 versus 2005
- Fewer people exposed to risks greater than 100-in-1 million in 2011 versus 2005
- Fewer urban areas with risks greater than 100-in-1 million in 2011 versus 2005

However, NATA found the highest national cancer risk in southeast Louisiana adjacent to a Dupont/Denka Neoprene facility. At this location, long-term cancer risk of 800-in-a-million was indicated by NATA. This high risk is driven by chloroprene emissions from the DuPont/DENKA Neoprene Production facility.

### **TOPLINE MESSAGES**

- The National Air Toxics Assessment (NATA) is a screening tool that identifies areas for further analysis to protect Americans from potential health risks.
  - o NATA contains emissions data from 2011 and uses models to make broad estimates of health risks over geographic areas of the country. It is not based on air monitoring.
- EPA's analysis of this round of data identified a census tract in La Place, LA, with a lifetime

cancer risk of 800-in-a-million due to chloroprene emissions from the DuPont/DENKA Neoprene Production facility.

- Chloroprene is a chemical used in the production of Neoprene. Neoprene has a variety of uses, such as wetsuits, gaskets, hoses and adhesives. Chloroprene is classified as a carcinogen by several agencies, including EPA.
- The levels indicated by this analysis would not be expected to pose immediate acute health concerns.
- While this analysis indicates the need for further follow up, it does not definitively mean that risks in this area are at that level. A closer look at the pollution controls and operations at the facility and air monitoring in the surrounding area and nearby communities are necessary to more confidently assess the risks.
- EPA verified the modeled emissions data with DuPont/DENKA. Using its authority under the Clean Air Act, the agency will require the facility to provide data and perform more detailed stack testing for emissions and a review of emission controls at the facility.
- The agency is currently investigating the feasibility of conducting ambient monitoring around the facility and within the community.
- We are working with the Agency for Toxic Substances and Disease Registry (ATSDR) to initiate a letter health consultation.
- EPA will continue to work with the state, local communities and the facility to address emissions in the near term and will initiate a review of the Clean Air Act toxics regulations that are currently in place to determine what level of risks remain and whether new technologies and approaches can further reduce emissions and risks from chemical manufacturers in this sector.
- 

## **OUTREACH SCHEDULE**

- **December 9 – Password Protected Release of NATA App to State Agencies.**
- **December 14 – Briefing and webinar for management at LDEQ and LDHH.**
- December 14 – Notification St. John the Baptist Parish President – Natalie Robottom staff and offer full briefing
- December 14 – Notification Governor-elect Edwards Transition Team
- December 15 – Briefing and webinar Louisiana Environmental Action Network (Marylee Orr), Citizen Scientist (Wilma Subra), and GreenARMY (General Honore).
- December 16 –
- Briefing and webinar with Parish officials

## **Day of release**

- **Written Notification Louisiana Congressional Delegation**
- **Written Notification with local of state environmental groups**
  - o Louisiana Bucket Brigade – Ann Rolfes
  - o Deep South Center for Environmental Justice (DSCEJ) – Dr. Beverly Wright
  - o New Orleans Sierra Club – Darryl Malek-Wiley
- **December 17 – If needed; Media Interview with New Orleans Times Picayune and Baton Rouge Advocate**
- 
- LA Community Webinar – NATA App Demonstration

#### **Post release - TBD**

- Week of January 4 - Community outreach meeting in St. John the Baptist Parish

#### Questions/Answers

Q: What is Chloroprene?

A: Chloroprene is a chemical used in the production of neoprene. Neoprene has a variety of uses, such as in wetsuits, gaskets, hoses, and adhesives. Chloroprene is classified as a carcinogen by several agencies, including EPA.

Q: Why was chloroprene added to the list of HAPs?

A: In 2010 EPA's Integrated Risk Information System (IRIS) assessment – which identifies and characterizes the health hazards of chemicals found in the environment – identified chloroprene as a likely human carcinogen and provided a unit risk estimate (URE). A URE provides the upper-bound excess lifetime cancer risk estimated to result from continuous exposure to an agent at a concentration of 1 microgram per cubic meter ( $\mu\text{g}/\text{m}^3$ ) in air. The URE for chloroprene was used in the 2011 NATA.

Q: What is the difference between a known, likely and probable carcinogen?

A: There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.

Q: What is the health risk?

A: There is no acute (short-term) risk concern. The concern is potential chronic (long-term/lifetime) cancer risk from chloroprene.

Q: Why wasn't this facility identified in previous NATA assessments?

A: The IRIS assessment for chloroprene was completed in 2010. While the previous NATA was released in early 2011, the analyses were completed in 2010 prior to the availability of the URE for chloroprene. – five years after the 2005 NATA. At the time of the 2005 NATA, chloroprene did have a noncancer reference concentration – a measure of potency for pollutants with effects other than cancer – and that was used in the assessment.

Q: Does EPA have any regulations for chloroprene?

A: Chloroprene is used in the production of Neoprene, which is covered under EPA's Polymers and Resins I source category. This source category went through a risk and technology review (RTR) in 2008. No cancer risks were estimated at that time because chloroprene did not have a URE.

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A: Under Section 112 of the Clean Air Act, EPA is required to periodically perform a review of standards and available technologies for categories for which we have set technology-based standards (e.g., a MACT standard). When that category comes up for review...

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A: NATA is a screening tool that tells use where to look as we gather more information. EPA will launch a process to engage the community and local leaders in developing

a plan to gather information important to addressing community concerns, and useful to EPA as it evaluates regulatory changes need to protect public health and the environment.

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  - County and facility level
- Modeled Ambient and Exposure Concentration Data
  - Pollutant (180) and source category (broad) summaries at census tract level
- Cancer and Noncancer Risks
  - About 140 pollutants at census tract level
  - Pollutants and source group (41) summaries
  - Cancer risks expressed as in-1 million
  - Noncancer risks expressed as Hazard Indices

Q: How long has this been going on?

A: The DuPont-La Place facility has been emitting chloroprene for many years with even higher emissions in the past.

Not included above, TRI reports 1988, 1989 and 1990 chloroprene emissions from this facility were: 479 tpy, 486 tpy, and 461 tpy, respectively.

Q: What is the facility allowed to emit under its CAA permit?

A: The current allowable emissions from the facility are 200 tpy, with a few emission points at the facility emitting the majority of the chloroprene.

Q: What are highest NATA cancer risk areas in the USA?

A: The top 6 census tracts with the highest NATA estimated highest cancer risks nationally are in Louisiana due to DuPont chloroprene emissions.

|    | State | EPA Region    | County                      | Census Tract      | Population | Point Cancer Risk (per million) | Total Cancer Risk (per million) | Cancer Risk due to Chloroprene |
|----|-------|---------------|-----------------------------|-------------------|------------|---------------------------------|---------------------------------|--------------------------------|
| 1  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>2209507082</u> | 20,537     | 776.802                         | 826.311                         | 768.460                        |
| 2  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>2209507093</u> | 10,115     | 426.667                         | 473.140                         | 419.106                        |
| 3  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>2209507056</u> | 10,229     | 327.119                         | 367.928                         | 320.998                        |
| 4  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>2209507074</u> | 10,348     | 235.541                         | 290.550                         | 224.896                        |
| 5  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>0000000004</u> | 15,924     | 209.476                         | 253.830                         | 201.617                        |
| 6  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>2209507044</u> | 10,381     | 164.790                         | 206.650                         | 158.515                        |
| 7  | PA    | EPA Region 3  | Allegheny                   | <u>4200343242</u> | 10,584     | 162.421                         | 200.620                         | 0.000                          |
| 8  | LA    | EPA Region 6  | St. John the Baptist Parish | <u>2209507036</u> | 10,258     | 142.753                         | 184.737                         | 135.887                        |
| 9  | WA    | EPA Region 10 | King                        | <u>5303300823</u> | 10,280     | 0.507                           | 165.908                         | 0.001                          |
| 10 | CA    | EPA Region 9  | San Francisco               | <u>0607501170</u> | 10,783     | 0.717                           | 161.040                         | 0.000                          |

The 3 more census tracts in the top 30 of NATA estimated highest risks are also in the same parish due to DuPont chloroprene emissions.

|    | State | EPA<br>Region   | County                         | Census<br>Tract    | Population | Total Cancer Risk (per<br>million) |
|----|-------|-----------------|--------------------------------|--------------------|------------|------------------------------------|
| 11 | LA    | EPA<br>Region 6 | St. John the Baptist<br>Parish | <u>22095071100</u> | 3,398      | 160.621                            |
| 18 | LA    | EPA<br>Region 6 | St. John the Baptist<br>Parish | <u>22095071000</u> | 2,840      | 148.656                            |
| 28 | LA    | EPA<br>Region 6 | St. John the Baptist<br>Parish | <u>22095070200</u> | 7,323      | 129.680                            |

6

Sent from my iPhone

**To:** Curry, Ron[Curry.Ron@epa.gov]; Coleman, Sam[Coleman.Sam@epa.gov]; Gray, David[gray.david@epa.gov]; Ruiz, Thomas[Ruiz.Thomas@epa.gov]; Blanco, Arturo[Blanco.Arturo@epa.gov]; Blevins, John[Blevins.John@epa.gov]; Seager, Cheryl[Seager.Cheryl@epa.gov]; Edlund, Carl[Edlund.Carl@epa.gov]; Garcia, David[Garcia.David@epa.gov]; Gilrein, Stephen[gilrein.stephen@epa.gov]; Harrison, Ben[Harrison.Ben@epa.gov]; Hill, Troy[Hill.Troy@epa.gov]; Honker, William[honker.william@epa.gov]; McDonald, James[McDonald.James@epa.gov]; Phillips, Pam[phillips.pam@epa.gov]; Smith, Rhonda[smith.rhonda@epa.gov]; Taheri, Diane[Taheri.Diane@epa.gov]  
**From:** Stenger, Wren  
**Sent:** Wed 12/16/2015 11:58:54 PM  
**Subject:** DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 16 2015.docx  
[DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 16 2015.docx](#)

Here is an updated draft. Please review and send edits in red line to me. Thanks

**To:** Phillips, Pam[phillips.pam@epa.gov]; Ruhl, Christopher[Ruhl.Christopher@epa.gov]; Edlund, Carl[edlund.carl@epa.gov]  
**From:** Johnson, Lydia  
**Sent:** Thur 12/3/2015 9:43:46 PM  
**Subject:** Dupont Neoprene Plant La Place, LA - Meeting Notes

Purpose of meeting was to gather information for the RA for the roll out of the air toxics data

## Ex. 5 - Deliberative

# **Ex. 5 - Deliberative**

**To:** Blevins, John[Blevins.John@epa.gov]  
**From:** Stenger, Wren  
**Sent:** Thur 12/10/2015 2:17:01 PM  
**Subject:** RE: NATA Chloroprene Issue

Calendar invite rec'd for 12:30 today. Call in number provided. Will you be in the office or calling in?

**Wren Stenger**

**Director**

**Multimedia Planning and Permitting Division**

**EPA Region 6 Dallas, Texas**

**214.665.6583**

**From:** Blevins, John  
**Sent:** Wednesday, December 09, 2015 7:44 PM  
**To:** Stenger, Wren  
**Cc:** Lassiter, Penny; Tsirigotis, Peter; Erika Sasser; Rimer, Kelly  
**Subject:** Re: NATA Chloroprene Issue

I can make either work.

John

Sent from my iPhone

On Dec 9, 2015, at 4:44 PM, Stenger, Wren <[stenger.wren@epa.gov](mailto:stenger.wren@epa.gov)> wrote:

Penny, sure. I can move a meeting if that helps. Looks like John and I could be available at either 11 AM or Noon Central time. John is either good for you?

**Wren Stenger**

**Director**

**Multimedia Planning and Permitting Division**

**EPA Region 6 Dallas, Texas**

**214.665.6583**

**From:** Lassiter, Penny

**Sent:** Wednesday, December 09, 2015 4:23 PM

**To:** Stenger, Wren

**Cc:** Tsirigotis, Peter; Erika Sasser; Blevins, John; Rimer, Kelly

**Subject:** NATA Chloroprene Issue

Wren,

I spoke with Peter Tsirigotis this afternoon. He would like to have a call with you and John Blevins tomorrow. Please let me know your availability tomorrow because we'd also like to include Erika Sasser in a discussion on next steps.

**Ex. 5 - Deliberative**

**Ex. 5 - Deliberative**

**Penny Lassiter**

**Group Leader**

**Refining and Chemicals Group**

SPPD/OAQPS

U.S. Environmental Protection Agency

Mail Code: E143-01

Research Triangle Park, NC 27711

(919) 541-5396

[lassiter.penny@epa.gov](mailto:lassiter.penny@epa.gov)

**To:** Osbourne, Margaret[osbourne.margaret@epa.gov]  
**From:** Thompson, Steve  
**Sent:** Fri 12/11/2015 7:30:17 PM  
**Subject:** Dupont emails  
[Fwd: Chloroprene/DuPont](#)  
[FW: DuPont in LaPlace, LA - TRI](#)  
[FW: DuPont LaPlace - TRI](#)  
[FW: DuPont LaPlace - TRI](#)  
[RE: Upcoming EPA National Air Toxics Assessment release and information regarding potential risks associated with Dupont facility in LaPlace, LA](#)  
[FW: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx](#)  
[FW: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx](#)  
[FW: DUPONT Information](#)  
[FW: DuPont Laplace permit data](#)  
[DuPont Laplace permit data](#)  
[FW: DuPont Laplace 2014 Emissions Inventory](#)  
[FW: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx](#)  
[Upcoming EPA National Air Toxics Assessment release and information regarding potential risks associated with Dupont facility in LaPlace, LA](#)  
[Re: NATA Briefing for Janet](#)

Here are all of the emails that I have regarding Dupont. Some information may be worth putting up on the Sharepoint site

**To:** Parrish, Robert[Parrish.Robert@epa.gov]  
**From:** Osbourne, Margaret  
**Sent:** Fri 12/4/2015 2:41:18 PM  
**Subject:** DuPont case

Hi Rob:

Hope you're well. I'm hoping you can provide a status on your DuPont case. We have concerns at one of their facilities in LA.

Thanks,

Margaret

Margaret Osbourne

Chief, Air Toxics Section

Compliance Assurance & Enforcement Division

EPA Region 6

1445 Ross Avenue (6EN-AT)

Dallas, TX 75202

214-665-6508

*Confidentiality Warning:*

*This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.*

**From:** Thompson, Steve  
**Sent:** Friday, December 04, 2015 8:12 AM  
**To:** Osbourne, Margaret  
**Subject:** Fwd: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

Lets talk on Monday. This is a facility that is driving some the highest risks in the new NATA that is going to be released this month. The risk is driven by an updated risk number for a unique chemical at this facility.

Sent from my iPhone

Begin forwarded message:

**From:** "Blevins, John" <[Blevins.John@epa.gov](mailto:Blevins.John@epa.gov)>  
**Date:** December 4, 2015 at 7:27:35 AM CST  
**To:** "Thompson, Steve" <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>, "Overbay, Connie" <[Overbay.Connie@epa.gov](mailto:Overbay.Connie@epa.gov)>  
**Cc:** "Gilrein, Stephen" <[gilrein.stephen@epa.gov](mailto:gilrein.stephen@epa.gov)>, "Yurk, Jeffrey" <[yurk.jeffrey@epa.gov](mailto:yurk.jeffrey@epa.gov)>  
**Subject:** Fwd: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

FYI. See action plan. We have some items to work on. Please see if you can set up a call/mtg early next week with OHSA contacts to bring them up to speed.

Also reach out to HQ and get status update on their settlement discussion with DuPont. Does it include this facility?

Connie- can you please pull together inspection and enforcement history (all programs) for the facility. Hopefully you can include state actions in summary.

Thanks

John

Sent from my iPhone

Begin forwarded message:

**From:** "Stenger, Wren" <[stenger.wren@epa.gov](mailto:stenger.wren@epa.gov)>  
**Date:** December 3, 2015 at 5:26:34 PM EST  
**To:** "Blevins, John" <[Blevins.John@epa.gov](mailto:Blevins.John@epa.gov)>, "Seager, Cheryl" <[Seager.Cheryl@epa.gov](mailto:Seager.Cheryl@epa.gov)>, "Edlund, Carl" <[Edlund.Carl@epa.gov](mailto:Edlund.Carl@epa.gov)>, "Garcia, David" <[Garcia.David@epa.gov](mailto:Garcia.David@epa.gov)>, "Gilrein, Stephen" <[gilrein.stephen@epa.gov](mailto:gilrein.stephen@epa.gov)>, "Gray, David" <[gray.david@epa.gov](mailto:gray.david@epa.gov)>, "Harrison, Ben" <[Harrison.Ben@epa.gov](mailto:Harrison.Ben@epa.gov)>, "Hill, Troy" <[Hill.Troy@epa.gov](mailto:Hill.Troy@epa.gov)>, "Honker, William" <[honker.william@epa.gov](mailto:honker.william@epa.gov)>, "McDonald, James" <[McDonald.James@epa.gov](mailto:McDonald.James@epa.gov)>, "Phillips, Pam" <[phillips.pam@epa.gov](mailto:phillips.pam@epa.gov)>, "Smith, Rhonda" <[smith.rhonda@epa.gov](mailto:smith.rhonda@epa.gov)>, "Taheri, Diane" <[Taheri.Diane@epa.gov](mailto:Taheri.Diane@epa.gov)>, "Blanco, Arturo" <[Blanco.Arturo@epa.gov](mailto:Blanco.Arturo@epa.gov)>, "Coleman, Sam" <[Coleman.Sam@epa.gov](mailto:Coleman.Sam@epa.gov)>, "Curry, Ron" <[Curry.Ron@epa.gov](mailto:Curry.Ron@epa.gov)>  
**Cc:** "Crossland, Ronnie" <[Crossland.Ronnie@epa.gov](mailto:Crossland.Ronnie@epa.gov)>, "Yurk, Jeffrey" <[yurk.jeffrey@epa.gov](mailto:yurk.jeffrey@epa.gov)>, "Johnson, Lydia" <[johnson.lydia@epa.gov](mailto:johnson.lydia@epa.gov)>, "Verhalen, Frances" <[verhalen.frances@epa.gov](mailto:verhalen.frances@epa.gov)>, "Hansen, Mark" <[Hansen.Mark@epa.gov](mailto:Hansen.Mark@epa.gov)>, "Casso, Ruben" <[Casso.Ruben@epa.gov](mailto:Casso.Ruben@epa.gov)>, "Anderson, Israel" <[Anderson.Israel@epa.gov](mailto:Anderson.Israel@epa.gov)>, "Runnels, Charlotte" <[Runnels.Charlotte@epa.gov](mailto:Runnels.Charlotte@epa.gov)>, "Brown, Jamesr" <[brown.jamesr@epa.gov](mailto:brown.jamesr@epa.gov)>, "McGee, Tomika" <[McGee.Tomika@epa.gov](mailto:McGee.Tomika@epa.gov)>  
**Subject:** DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

All, here is the framework for the Action Plan we developed this afternoon. I added an OEJTA category with several items that we discussed and seemed important. Please input your program information. Add anything you think is missing.

David, Arturo, I did not include the Communications Plan in this file since it is different from the action plan.

I am sending to DD/Deputies and cc'd a few others that may be tapped for input. Share with your folks as needed.

Instructions:

DO NOT add any formatting. Insert your information using Times Roman 12, single line formatting.

Find your header and topic, then insert your story and information.

One submission from each division.

I will try to get this posted on a sharepoint for future editing, but for now, please get your input to me and copy Tomika McGee ASAP.

Thanks

**To:** Verhalen, Frances[verhalen.frances@epa.gov]  
**From:** Casso, Ruben  
**Sent:** Tue 11/17/2015 8:03:28 PM  
**Subject:** updated DuPont-chloroprene fact sheet  
NATA-Chloroprene risk111715.doc

A few revisions to the general fact sheet we previously prepared and shared internally. I have access to the final NATA data and will compile details.

**To:** Hansen, Mark[Hansen.Mark@epa.gov]; Verhalen, Frances[verhalen.frances@epa.gov];  
Casso, Ruben[Casso.Ruben@epa.gov]; Young, Carl[young.carl@epa.gov]  
**From:** Stenger, Wren  
**Sent:** Thur 12/3/2015 11:56:48 PM  
**Subject:** DuPont Chloroprene

On the 114 letter for OAQPS, we need a schedule from them to send a 114 to DuPont. Would we draft it for them? What is the plan?

**Wren Stenger**

**Director**

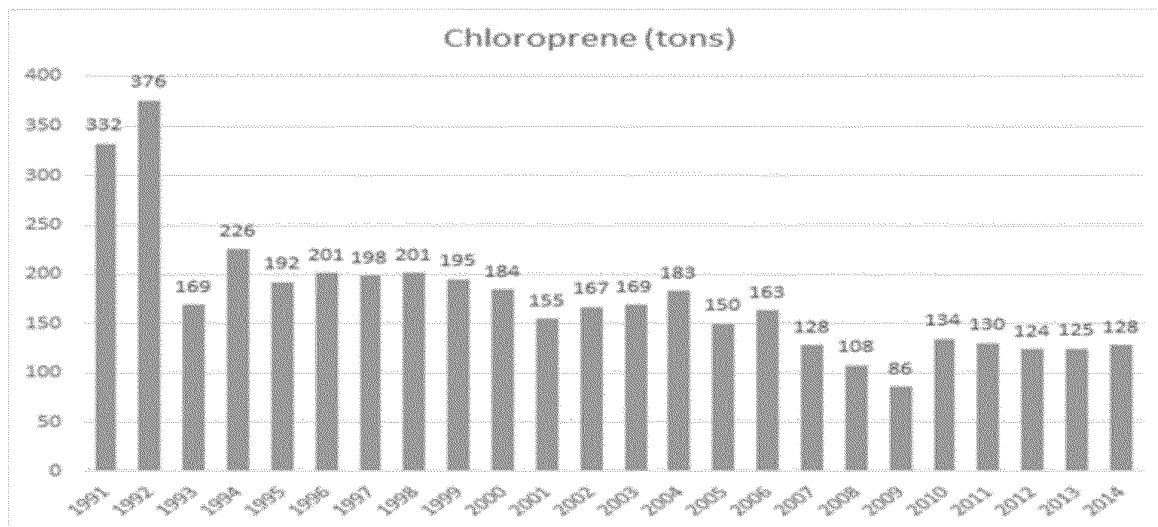
**Multimedia Planning and Permitting Division**

**EPA Region 6 Dallas, Texas**

**214.665.6583**

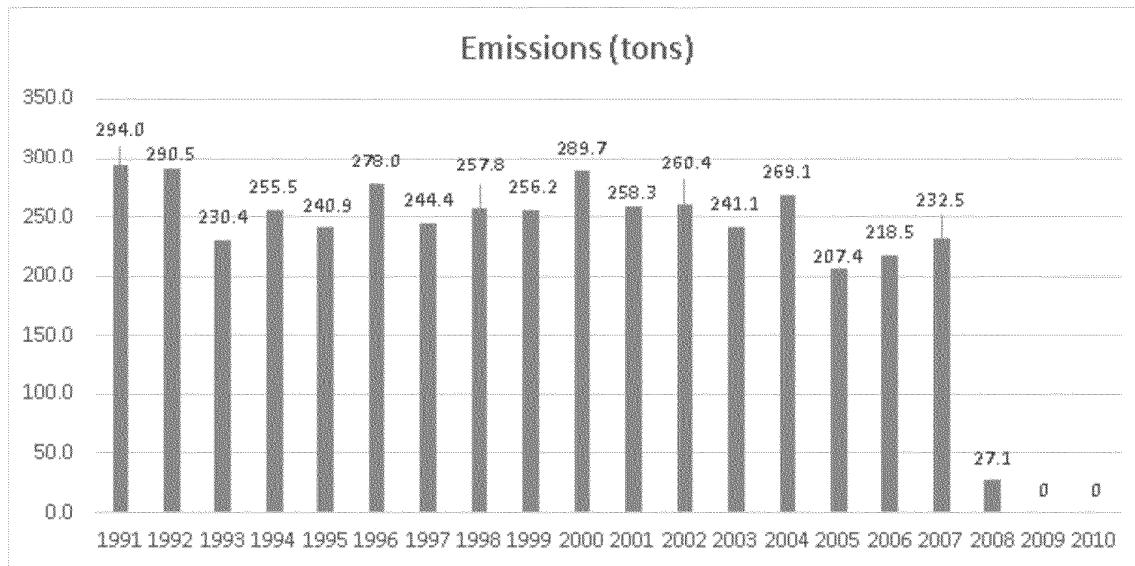
**To:** Wren Stenger[Stenger.Wren@epa.gov]; Hansen, Mark[Hansen.Mark@epa.gov]  
**From:** Verhalen, Frances  
**Sent:** Fri 12/18/2015 9:33:30 PM  
**Subject:** Additional Information Relating to SJB Action Plan  
2011 final NATA - highlights.pptx

1. 2011 NATA weblink, Dec. 17, 2015: <http://www.epa.gov/national-air-toxics-assessment>
2. LDEQ has ordered a chloroprene standard for use in air monitoring tasks (using their mobile air monitoring lab-MAML)
3. According to the released NATA chart, 7 out of the top 10 census tracts with a potential cancer risk over 100 incidences in 1,000,000 are in St. John the Baptist Parish. There are five (5) more census tracts in St. John the Baptist and St. Charles parishes (adjacent to St. John the Baptist) in LA over 100 incidences in 1,000,000 potential cancer risk, for a total of 12 census tracts in LA at the elevated potential risk.
4. DuPont Ponchartrain Works, La Place information from the LDEQ EI website plus older TRI data.



Not included above, TRI reports 1988, 1989 and 1990 chloroprene emissions from this facility were: 479 tpy, 486 tpy, and 461 tpy, respectively

5. DuPont Rubber Town Works, Louisville, KY data from TRI



TRI reports 1988, 1989 and 1990 chloroprene emissions from this facility were: 283 tpy, 257 tpy, and 232 tpy, respectively.

6. Ruben consolidated the NATA maps showing census tracts in the Region over  $10^{-4}$  in the attached powerpoint. We also confirmed that the proposed monitoring locations were in the census tracts where the two highest potential cancer risks occur.

7. The Regional Screening Level table, which we (EPA) often use for a quick reference to evaluate toxicity associated with a chemical, contains both the Integrated Risk Information System(IRIS) data and the Hazardous Index (HI).

a. IRIS information is listed in the table. However, you cannot tell from the table based on the IRIS information if a chemical has acute or chronic toxicity. This specific information is contained in the summary information within the IRIS database online.

b. If a chemical has an HI greater than 1, then it has acute toxicity.

c. For chloroprene, per Jon Rauscher, the reference concentration is based on a daily exposure of 8 hrs per day for five (5) days per week for 70 years. The inhalation risk factor is based on based on a daily exposure of 24 hours per day for seven (7) days per week for 70 years. Both of these concentrations assume that a person weighing 70 kgs will breather 20 cubic meters of air per day. Jon also said that the short-term exposure to a carcinogen can be prorated

(linearly) if time of exposure is different (i.e., if the person only lived in the area for seven years instead of 70 years, then the exposure would 10% of the total).

Frances Verhalen, P.E., Chief

Air Monitoring and Grants Section

US Environmental Protection Agency

1445 Ross Avenue (MC 6MM-AM)

Dallas, TX 75202

214-665-2172

[verhalen.frances@epa.gov](mailto:verhalen.frances@epa.gov)

**To:** Yurk, Jeffrey[yurk.jeffrey@epa.gov]  
**From:** Thompson, Steve  
**Sent:** Fri 12/11/2015 1:47:58 PM  
**Subject:** Any quick input on the 114 questions?

The Facility contains emission units that emit or have the potential to emit pollutants that are subject to requirements of the Clean Air Act (CAA). Accordingly, Denka must provide the following information for the Facility:

1. A scaled site plot plan drawing of the Facility and the area immediately surrounding the Facility. The plot plan should include the Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2 and containing the following:
  - a. Property lines on all sides, true north arrow orientation, and showing immediately adjacent streets or property names;
  - b. Buildings, structures, significant features and equipment areas on the plant property, with labels or a legend identifying each building, structure, feature or area; and
  - c. Labels or a legend identifying the locations and names of all air emission sources that emit **chloroprene** at the Facility, consistent with permit ID No. designations and names found in the Facility's above-referenced Title V air permits.
2. Provide up-to-date detailed process flow diagrams for all production processes and affected auxiliary support operations at the Facility (e.g., wastewater treatment, loading/unloading etc.), where chloroprene is an emitted pollutant. On the diagrams, using a key for clarity purposes, identify each of the units identified in response to question #1. The diagram must include all emissions units, continuous emissions monitoring systems ("CEMS"), continuous opacity monitoring systems ("COMS"), and all Air Pollution Control Equipment ("APCE"), labeled in a manner consistent with the Facility's LDEQ Air Permits.
3. Provide complete copies of air dispersion modeling studies or reports completed during calendar years 2011 through 2015, for air permitting or other emissions authorization, risk management plans, disaster prevention and release response planning, or episodic release reporting. Include as electronic attachments any emission source modeling spreadsheets developed and employed, plus input and output files in their native format from the modeling software or program used.
4. Provide all emission calculations of chloroprene that were prepared for LDEQ air permit

applications and emission inventories in calendar years 2011 through 2015, including references or bases for emission factors and calculation methodologies used.

5. For any emission point where chloroprene is a pollutant, please list occurrences where the reported emission value to the emission inventory is within 2 % of the permitted allowable or the previous year's emissions inventory submittal. For these occurrences, provide an explanation of why the values are the so similar (e.g., is the previous years reported emissions used to estimate the future emission, does the methodology used to estimate emissions leave no room for inaccuracy, etc.).
6. Provide all usage threshold determinations and air release calculations for chloroprene from Toxic Chemical Release Inventory (TRI) reports for calendar years 2010 through 2014, including references or bases for estimating air releases, including estimation and calculation methodologies used.
7. Provide all measurements, engineering assessments, and calculations performed to determine the most recent TRE index value for any applicable MACT standard. Include any data, assumptions and procedures used for the engineering assessments.
8. Provide the most recent performance testing records required by the above referenced Title V air permits (Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2).
9. Provide the most recent submittal of any notification of compliance status used to comply with any applicable MACT standards.\_

Steve Thompson

Branch Chief

Air Enforcement Branch

Compliance Assurance and Enforcement Division

U.S. EPA Region 6

Dallas, TX 75202

214-665-2769

thompson.steve@epa.gov

**To:** Thrift, Mike[thrift.mike@epa.gov]  
**From:** Diem, Art  
**Sent:** Fri 12/11/2015 7:23:20 PM  
**Subject:** briefing documents for NATA & Neoprene facility  
DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 10 2015 AD.docx  
NATA briefing for Janet McCabe 12 2 15 final.pptx

Hi Mike,

FYI.

Attached presentation used to briefing Janet McCabe on 12/2/2015 regarding the forthcoming release of NATA (see .pptx file)

Attached is a DRAFT action plan regarding the Neoprene facility (see .docx file)

Thanks,

Art

-----

Art Diem, Environmental Engineer

USEPA Office of Air Quality Planning and Standards,

Sector Policies and Programs Division, Refining and Chemicals Group

Diem.Art@epa.gov

919-541-1185

**To:** Palma, Ted[Palma.Ted@epa.gov]  
**From:** Diem, Art  
**Sent:** Fri 10/16/2015 1:14:10 PM  
**Subject:** RE: Follow up on chloroprene modeling and additional questions

Hi Ted,

Thanks for sharing this with me.

Art

-----

Art Diem, Environmental Engineer

USEPA Office of Air Quality Planning and Standards,

Sector Policies and Programs Division, Refining and Chemicals Group

Diem.Art@epa.gov

919-541-1185

**From:** Palma, Ted  
**Sent:** Friday, October 16, 2015 7:18 AM  
**To:** Diem, Art; Lassiter, Penny; Pagan, Ines; Smith, Darcie  
**Cc:** Keating, Martha; Rimer, Kelly  
**Subject:** FW: Follow up on chloroprene modeling and additional questions  
**Importance:** High

FYI, response from last week's call with DuPont

Ted Palma

USEPA

OAQPS/HEID/ATAG

MD C539-02

RTP, NC 27711

919-541-5470 (work)

[palma.ted@epa.gov](mailto:palma.ted@epa.gov)

**From:** [PATRICK.A.WALSH@dupont.com](mailto:PATRICK.A.WALSH@dupont.com) [mailto:[PATRICK.A.WALSH@dupont.com](mailto:PATRICK.A.WALSH@dupont.com)]  
**Sent:** Thursday, October 15, 2015 6:28 PM  
**To:** [Kelly.Petersen@LA.gov](mailto:Kelly.Petersen@LA.gov); [Doris.B.Grego@dupont.com](mailto:Doris.B.Grego@dupont.com); [James.B.Allen@dupont.com](mailto:James.B.Allen@dupont.com); [Carlos.F.Saldana@dupont.com](mailto:Carlos.F.Saldana@dupont.com); Palma, Ted; Morris, Mark; Casso, Ruben; Rimer, Kelly; Strum, Madeleine  
**Subject:** RE: Follow up on chloroprene modeling and additional questions  
**Importance:** High

All,

I have reviewed all the appropriate information and my position hasn't changed. I'm worried that EPA is going down the wrong path. Let me explain my thinking to you:

My problem is that the data as presented by EPA with regard to NATA are presented as "cancer risk":

| Facility ID | FIPS Code | Tribal Parameter | Pollutant   | Risk Value (cancer risk reported in a million) | Facility Emissions (tpy)                        | Facility State Name | County Comm Name     |
|-------------|-----------|------------------|-------------|------------------------------------------------|-------------------------------------------------|---------------------|----------------------|
| 802662209   | 2209      | Cancer risk      | Chloroprene | 16.0440.0775                                   | E I DuPont de Nemours & Co - Pontchartrain Site | LA                  | St. John the Baptist |

(Taken from email from Madeleine Strum to Kelly Petersen, 6/24/15)

That would read to most people that chloroprene is a known, proven human carcinogen. But it hasn't been proven, or even generally accepted, and EPA's own toxicology data states such.

The IRIS database for chloroprene reads similarly to the IARC monograph:

"Under the Guidelines for Carcinogen Risk Assessment (U.S. EPA, 2005), there is evidence that chloroprene is 'likely to be carcinogenic to humans'"

Even the IRIS group will not explicitly state that chloroprene is a KNOWN human carcinogen. The entire series of documents discusses chloroprene's carcinogenicity in mice and rats only. While they can be used as models for human physiology, mice and rats are NOT human, and there are numerous examples of materials that are spectacularly toxic to non-human animals but have little or no effect on humans (chocolate springs to mind). Therefore, it is, in my opinion, an irresponsibly large leap to present the chloroprene release data as definitely carcinogenic to humans by presenting it as "increased cancer risk".

In addition, the epidemiological data does not comport with the model at all. The following table describes actual cancer rates for St. John Parish for the most recent 4-year period for which data is available:

| Rank | County                           | Annual Incidence Rate(†) over rate period - cases per 100,000 | Lower 95% Confidence Interval | Upper 95% Confidence Interval | Average Annual Count over rate period | Rate Period | Recent 5-Year Trend (‡) in Incidence Rates | Lower 95% Confidence Interval | Upper 95% Confidence Interval |
|------|----------------------------------|---------------------------------------------------------------|-------------------------------|-------------------------------|---------------------------------------|-------------|--------------------------------------------|-------------------------------|-------------------------------|
| 53   | St. John the Baptist Parish(7,9) | 460.8                                                         | 432.3                         | 490.7                         | 209                                   | 2008-2012   | stable -2.2                                | -9.4                          | 5.6                           |

(Data from <http://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=22&cancer=001&race=00&sex=0&ac>)

Given the following:

1. 50+ year history making chloroprene in St. John Parish
2. 20-30 year latency period for most cancers

According to the risk factors EPA attributes to our chloroprene emissions, St. John Parish should have the highest cancer rate in the state. This should be especially true given that our history of emitting chloroprene is much longer than the typical latency for cancer. But in actuality, St. John is in the lowest quartile of measured cancer rates in the state (#53 out of 66 parishes) and the rate of cancer is decreasing according to the 5-year trend. Thus, the model has a serious flaw as it doesn't come close to reflecting real, published cancer rate data.

The above, taken together, indicate that EPA is planning to publish misleading data in an inflammatory way. Therefore, it would be irresponsible to publish it. I strongly urge EPA to reconsider its present course.

Patrick A. Walsh, CIH

E.I. DuPont De Nemours and Company

Safety, Health, Environmental, and PSM Manager

DuPont Performance Polymers Pontchartrain Works

LaPlace, LA 70068

(985) 536-5731 Work

(251) 321-5989 Mobile

[Patrick.A.Walsh@dupont.com](mailto:Patrick.A.Walsh@dupont.com)



-----Original Appointment-----

**From:** Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]

**Sent:** Tuesday, October 06, 2015 10:09 AM

**To:** Kelly Petersen; GREGO, DORIS B; ALLEN, JAMES B; SALDANA, CARLOS F; Palma, Ted; Morris, Mark; Casso, Ruben; 'Rimer, Kelly'; Strum, Madeleine; WALSH, PATRICK A.

**Subject:** Follow up on chloroprene modeling and additional questions

**When:** Tuesday, October 06, 2015 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

**Where:** `DEQ/Room 919 - OMF Conference

Please join a conference call at 11am central time on Tuesday, October 6<sup>th</sup>. The call in information is below.

Meeting Number: 4341356

To join the conference call:

(1) Dial 888-363-4735, or 215-446-3657 for international calls.

(2) Enter the Meeting Number, then #

Thanks, Kelly Petersen

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Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

[http://www.DuPont.com/corp/email\\_disclaimer.html](http://www.DuPont.com/corp/email_disclaimer.html)



Also attached (2<sup>nd</sup> email) is how James Thurman, remodeled some huge 500 ft by 500 ft area sources (submitted by LADEQ). James' remodeling was based on the fan information Doris provided in the first email. I converted it all to English Units and sent it back to Steve Fudge (with Doris' other release point changes for a few of the non-fan sources --- i.e., in the xls file).

Steve remodeled as part of the NEI review comments for final NATA modeling. I labeled the new "fan" release points as ERPTYPE=3.

**From:** Morris, Mark  
**Sent:** Monday, December 14, 2015 7:03 PM  
**To:** Strum, Madeleine <Strum.Madeleine@epa.gov>  
**Subject:** Fw: ERICEmissionsInventory\_1302606\_38806\_2014.xls

fyi

---

**From:** Amanda Polito <[Amanda.Polito@LA.GOV](mailto:Amanda.Polito@LA.GOV)>  
**Sent:** Monday, December 14, 2015 4:30 PM  
**To:** Morris, Mark  
**Subject:** Fwd: ERICEmissionsInventory\_1302606\_38806\_2014.xls

It's been a day! Thank you sooo much!!!

Begin forwarded message:

**From:** Amanda Polito <[Amanda.Polito@LA.GOV](mailto:Amanda.Polito@LA.GOV)>  
**Date:** December 14, 2015 at 3:01:39 PM CST  
**To:** "[Casso.Ruben@epa.gov](mailto:Casso.Ruben@epa.gov)" <[Casso.Ruben@epa.gov](mailto:Casso.Ruben@epa.gov)>  
**Subject:** Fwd: ERICEmissionsInventory\_1302606\_38806\_2014.xls

O dear. I sent you the wrong file. The locations are under the release point tab.

Amanda

**To:** Chance McNeely - LDEQ assistant secretary[deqoec@la.gov]; Cheryl Nolan[tegan.treadaway@la.gov]  
**Cc:** McQuiddy, David[Mcquiddy.David@epa.gov]; Humphrey, Marvelyn[humphrey.marvelyn@epa.gov]  
**From:** Stenger, Wren  
**Sent:** Thur 12/17/2015 7:13:39 PM  
**Subject:** Chloroprene follow-up

Chance, Tegan,

Instead of summarizing, please see how our lab and TAGA folks answered about sharing the chloroprene standard. One thing I see is that the TAGA and the lab MSGC use a different type of chloroprene standard for calibrations (I wasn't aware of that.), and we have ordered both. Not sure how the "MAMMAL" is set-up.

After reading below, it is possible to share the standard, but it might be more trouble than it is worth. See what you think.

Also, Marvelyn Humphrey is out expert in the Houston Lab. We can hook you up with her for more detailed discussion if that is helpful. Just like I mentioned yesterday, we are having to do all the same start-up activities as you. We are glad to share what we have learned so far about chloroprene sampling and testing.

**Wren Stenger**

**Director**

**Multimedia Planning and Permitting Division**

**EPA Region 6 Dallas, Texas**

**214.665.6583**

**From:** McQuiddy, David  
**Sent:** Thursday, December 17, 2015 11:55 AM  
**To:** Stenger, Wren  
**Subject:** Chloroprene follow-up

Wren,

My apologies for the delayed response, continuous meeting's this morning shadowing Mr. Hill.

Regarding your follow-up questions;

How much standard did the Lab buy, i.e., how many total calibrations can we do?

A: The gas standard that we purchased contains 100 liters at 1 ppm by volume. We can perform approx. 1000 calibrations with the standard.

Do we do 1 calibration per day when running samples?

A: We check the calibration daily and run a calibration curve weekly, this equates to roughly 10 calibrations runs/analysis per week.

Does TAGA use same instrumentation as us, i.e., GC/MS?

A: Previous information from the TAGA operator indicates that if the TAGA is used for monitoring, the MS/MS system will be used. We do not use a MS/MS for air analysis. In addition, the TAGA would need a single component standard of chloroprene only, if monitoring is performed. The standard we ordered is a multi-component standard; other compounds are present. TAGA has placed an order for a single component chloroprene standard.

Be advised that if Region decides for TAGA and/or split samples with LDEQ, they may want to share our standard.

A. In order to share the standard, either the Houston lab or the party we share it with, must use the Entech cylinder we ordered to make up a less dilute standard to use for calibrations. So either the Houston lab would make the dilute standard and send it to the other lab or we send off the Entech cylinder and we would need it back.

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Chief, Environmental Services Branch

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**To:** Cheryl Nolan[tegan.treadaway@la.gov]; Chance McNeely - LDEQ assistant secretary[deqoec@la.gov]  
**From:** Stenger, Wren  
**Sent:** Wed 12/16/2015 10:02:29 PM  
**Subject:** chloroprene standard

I expect to have an answer about possibility of sharing the chloroprene std with you. It is not proprietary so depends on volume available in the standard and how much per calibration of the mobile unit or the lab equipment. Stand by.

**Wren Stenger**

**Director**

**Multimedia Planning and Permitting Division**

**EPA Region 6 Dallas, Texas**

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